

case # 118 CV 1134
Glover Jr. : Judge Baumgardner

U.S.

Boardman 3 : PRU se
IRION etc... : 3

FILED

JUN 30 2022

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

Response to brief, for motion for
Summary Judgment.

The plaintiff response to defendants motion to Summary Judgment. I am t. Glover Jr. was an detainee at cuyahoga county jail. When Corporal Boardman and C/O IRION was serving the breakfast meal on 7th floor pad 7. The corporal never serves the meals with staff. The Plaintiff stated in his / my complaint that the corporal was serving the morning meal with C/O IRION. Specifically for one reason, that was to cause harm to the Person of Jim t. Glover Jr. Also the defendant stated in own motion that Plaintiff was not wearing any close on full precaution. Reference to the CCC handbook on exhibit A. The only reason that detainee close would be taken from him, is he has destroyed the state property clothes, bedding, etc. Plaintiff did not do any of the criteria to be without clothes. Plaintiff was without clothes, for the purpose of malice and malicious intent.

The defendant's did not follow policy or procedure of the mental health policies of full precaution. The defendant's state in factual allegations of Plaintiff being aggressive when Inmate/Plaintiff cell door was opened. Why wasn't body cam operated immediately. It was not activated cause the defendant had malice in their intent, and came for the reason of assault on Jim Glover's person. The camera was conveniently activated after the assault. The Plaintiff was apologizing in stress. The Plaintiff was beaten at the C.C.C before 2009 Glover vs. Cuyahoga county, lawsuit filed in 2009 for assault with the district court of Northern, was dismissed due to 3 years after it happened. Plaintiff has had bad history with the employee's of C.C.C. The defendants has lots of paperwork to dispute these allegations, cause they are employee's and have been assaulting detainees for years. They make it where Plaintiff can not retrieve medical records or original complaint form. Every employee is friends with each other and work together to get rid of law suits, they have experience - I swear by perjury that on the approx date and time mentioned that Corporal bordman and c/o I LION jumped me, beat me with closed fist. Stumped me in the back of my head. sprayed me with c/o mace for no apparent reason on my behalf -

I was not being aggressive or being combative or threatening. That Corporal Boardman gave me foottray with one hand and sprayed me and some time with other. Him and c/o Irion proceeded inside my cell once I ran to back of my cell and pharell me with their fist and feet to torso and back of head.

I have reread these statements and do swear by perjury to be true and accurate.

Jim T Glover Jr.
Jim T. Glover Jr.

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